

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Consolidated
Civil Action Nos.

RECEIVED
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
MAY 29 2004
04-12260-GAO
04-12397-GAO
P 4:13

GREAT AMERICAN ALLIANCE)
INSURANCE COMPANY, et al.,)
)
Plaintiffs,)
)
V.)
)
RISO, INC.,)
)
Defendant.)
)
<hr/>	
RISO, INC.,)
)
Plaintiff,)
)
V.)
)
GREAT AMERICAN INSURANCE)
COMPANY, et al.,)
)
Defendants.)
)

LR 16.1(D) JOINT STATEMENT

Pursuant to Local Rule 16.1(D), the parties state as follows:

I. Discovery Plan

The Proposed Pretrial Scheduling Order, which is attached hereto at Tab A, sets forth the parties' proposal concerning the phasing of the case, the timetable for discovery, and the schedule for motion practice.

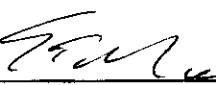
II. LR 16.1(D)(3) Certifications

The parties have filed, separately from this joint statement, the certifications demanded by LR 16.1(D)(3).

RISO, INC.,

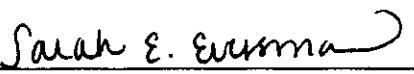
GREAT AMERICAN ALLIANCE INSURANCE COMPANY, GREAT AMERICAN ASSURANCE COMPANY, GREAT AMERICAN INSURANCE COMPANY and GREAT AMERICAN INSURANCE COMPANY OF NEW YORK,

By its attorneys,



Martin C. Pentz (BBO # 394050)
Eric P. Magnuson (BBO # 643805)
Nutter, McClellan & Fish, LLP
World Trade Center West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

By their attorneys,



A. Hugh Scott (BBO # 449160)
Robert A. Kole (BBO # 633269)
Choate, Hall & Stewart
Exchange Place
53 State Street
Boston, MA 02109-2804
(617) 248-5000

Richard H. Nicolaides, Jr. (*pro hac vice*)
Mary F. Licari (*pro hac vice*)
Sarah E. Eversman (*pro hac vice*)
Bates & Carey LLP
191 N. Wacker Drive, Suite 2400
Chicago, IL 60606
(312) 762-3100

Dated: March 28, 2005

1415943.1